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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

STEVEN EARL CARR, an individual,

Plaintiff,

V.

UNITED STATES OF AMERICA; DAVID N. KARPEL, individually, DOES 1 through 100; and ROES 1 through 100; inclusive,

### Defendants.

Case No.: 2:20-cv-01850-GMN-NJK

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR PLAINTIFF  
TO RESPOND TO MOTION TO DISMISS  
FILED BY DEFENDANTS UNITED STATES  
OF AMERICA AND DAVID N. KARPEL  
[ECF No. 26] AND FOR DEFENDANTS TO  
FILE THEIR REPLY**

## (First Request)

NOW COMES the Plaintiff, STEVEN EARL CARR, by and through his attorneys, Melanie A. Hill and Melanie Hill Law PLLC, and Defendants UNITED STATES OF AMERICA and DAVID N. KARPEL, by and through their attorneys, Assistant United States Attorney Gregory Addington, who hereby stipulate that Plaintiffs may have an extension of time from the current deadline of July 16, 2021 until August 2, 2021, within which to respond to the Defendants' Motions to Dismiss [ECF No. 26]. The parties further stipulate that Defendants shall have an extension of time from the current deadline of July 23, 2021 until August 23, 2021 to file their reply in support of the Motion to Dismiss [ECF No. 26]. This Stipulation is made at the request of all parties for the reasons set forth herein

1 and this is the first request for an extension of the deadlines to respond and reply to the pending  
2 Motion to Dismiss [ECF No. 26].

3 In support of this Stipulation and Order, the parties state as follows:

4       1. The second amended complaint was filed in this case on July 2, 2021 [ECF No. 25] after  
5 the Court entered an Order granting Plaintiff's Motion for Leave to File Proposed Second Amended  
6 Complaint and denying Defendants' Motion to Dismiss as moot on July 2, 2021 [ECF No. 24].  
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8       2. Defendants filed their Motion to Dismiss Plaintiff's Second Amended Complaint on July  
9 2, 2021 [ECF No. 26].

10      3. Counsel for all parties have conferred regarding Plaintiffs' request for an extension of the  
11 response deadline given her vacation from July 2, 2021 until July 14, 2021, and counsel for the  
12 Defendants has agreed to the requested extension. Defendants have also requested an extension of  
13 their reply deadline due to their early August vacation and Plaintiff has agreed.

14      4. This stipulation and order are being brought in good faith and is not sought for any  
15 improper purpose or other purpose of delay, but to allow counsel for the parties' additional time to  
16 respond and reply to the motion to dismiss and brief the necessary issues raised in the motion to  
17 dismiss due to their summer vacation schedules and unavailability.  
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1 WHEREFORE, the parties respectfully request that the Court extend the deadline for Plaintiff  
2 to respond to Defendants' Motion to Dismiss [ECF No. 26] from the current deadline of July 16,  
3 2021 until August 2, 2021. The parties further respectfully request that the Court extend the deadline  
4 for Defendants to file their reply from the current deadline of July 23, 2021 until August 23, 2021.  
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6 DATED this 13th day of July, 2021.

7 Respectfully submitted,

8 MELANIE HILL LAW PLLC

9 */s/ Melanie A. Hill*

10  
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*Attorney for Plaintiff Steven Earl Carr*

Respectfully submitted,

CHRISTOPHER CHIOU  
Acting United States Attorney

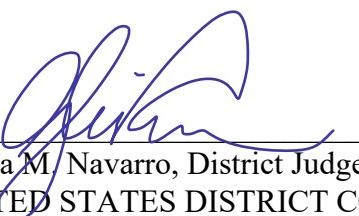
*/s/ Gregory Addington*

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*Attorney for Defendants United States of America, David L. Jaffe, and David N. Karpel*

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18 **IT IS SO ORDERED.**

19 Dated this 14 day of July, 2021.

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Gloria M. Navarro, District Judge  
23 UNITED STATES DISTRICT COURT  
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